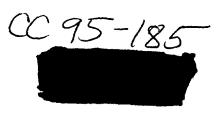
VERNER · LIIPFERT BERNHARD · MCPHERSON § HAND GHARTERED



901 - 15th Street, N.W. Washington, D.C. 20005-2301 (202) 371-6000 fax: (202) 371-6279

RECEIVED

WRITER'S DIRECT DIAL (202) 371-6060

NOV 1 2 1996

November 12, 1996

Federal Communications Commission
Office of Secretary

Mr. William F. Caton Acting Secretary Federal Communications Commission Room 222 1919 M Street, N.W. Washington, D.C. 20554

Re: Reply Comments of the Lower Colorado River Authority in CC Docket Number 96-98

Dear Mr. Caton:

Enclosed please find an original and eleven (11) copies of the Reply Comments of the Lower Colorado River Authority in the above-captioned docket.

Please direct any questions that you may have to the undersigned.

Sincerely,

Thomas J. Keller

Enclosures

RECEIVED

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

NOV 1 2 1996

Federal Communications Commission Office of Secretary

In the Matter of) CC Docket No. 96-98
Implementation of the Local Competition Provisions in the Telecommunications Act of 1996	
Interconnection between Local Exchange Carriers and Commercial Mobile Radio Service Providers	CC Docket No. 95-185

DOCKET FILE COPY ORIGINAL

REPLY COMMENTS OF THE LOWER COLORADO RIVER AUTHORITY

The Lower Colorado River Authority ("LCRA"), by its attorneys and pursuant to Section 1.429 of the Commission's Rules, ¹/₂ respectfully submits these reply comments in response to comments submitted by UTC, The Telecommunications Association ("UTC") and the American Public Power Association ("APPA") in the above-captioned proceeding. ²/₂ UTC and APPA filed comments in support of the Petition for Clarification of the Lower Colorado River Authority in this docket. ³/₂

^{1/ 47} C.F.R. §1.429 (1995).

^{2/} First Report and Order ("Interconnection Order"), FCC 96-325, CC Docket Nos. 96-98, 95-185 (Aug. 8, 1996), 61 Fed. Reg. 45,476 (1996), partial stay granted, lowa Utilities Board v. FCC, 1996 U.S. App. LEXIS 27953 (8th Cir. Oct. 15, 1996), petition for reversal of stay pending (U.S. Sup. Ct., filed Oct. 31, 1996).

^{3/} See UTC Consolidated Comments on Petitions for Clarification (Oct. 31, 1996); Reply Comments of the American Public Power Association in Support of Its Petition for Clarification or Reconsideration of the Commission's First Report and Order ("APPA Comments") (Oct. 31, 1996).

LCRA notes that UTC and APPA strongly support LCRAs request that the Commission clarify ambiguous language contained in Paragraph 994 of the Interconnection Order regarding the definition of "telecommunications services" so that the sale or lease of excess capacity on private fiber or microwave facilities would not subject electric utilities to interconnection obligations. Moreover, no party to this proceeding has objected to LCRAs request for clarification. LCRA agrees with APPAs request that the Commission segregate this clarification from other issues on reconsideration to avoid delay in the resolution of this issue.

Therefore, LCRA urges the Commission to clarify the meaning of Paragraph 994 by issuing a special notice or other comparable official release in an expeditious manner.

Respectfully submitted,

THE LOWER COLORADO RIVER AUTHORITY

Thomas J. Keller

Kathy D. Smith

Verner, Liipfert, Bernhard, McPherson & Hand, Chtd. 901 - 15th Street, N.W. Suite 700 Washington, D.C. 20005

(202) 371-6000

Its Attorneys

Dated: November 12, 1996

^{4/} See APPA Comments at 4.

CERTIFICATE OF SERVICE

I, Renee K. Kernan, a secretary with the law firm of Verner, Liipfert, Bernhard, McPherson and Hand, hereby certify that on this 12th day of November, 1996, a copy of the Reply Comments of the Lower Colorado River Authority was mailed, first-class, postage prepaid to:

Chairman Reed E. Hundt Federal Communications Commission 1919 M Street, NW -- Room 814 Washington, D.C. 20554

Commissioner James H. Quello Federal Communications Commission 1919 M Street, NW -- Room 802 Washington, D.C. 20554

Commissioner Rachelle B. Chong Federal Communications Commission 1919 M Street, NW -- Room 844 Washington, D.C. 20554

Commissioner Susan Ness Federal Communications Commission 1919 M Street, NW -- Room 832 Washington, D.C. 20554

William E. Kennard, Esq. General Counsel Federal Communications Commission 1919 M Street, NW -- Room 614 Washington, D.C. 20554

A. Richard Metzger, Jr.
Deputy Bureau Chief
Common Carrier Bureau
Federal Communications Commission
1919 M Street, NW -- Room 500
Washington, D.C. 20554

Suzanne Tetrault, Esq.
Office of the General Counsel
Federal Communications Commission
1919 M Street NW
Washington, D.C. 20554

Kalpak Gude Common Carrier Bureau Federal Communications Commission 1919 M Street, NW Washington, D.C. 20554

James Baller
Lana Meller
The Baller Law Group
1820 Jefferson Place, N.W.
Suite 200
Washington, D.C. 20036
Counsel for the American
Public Power Association

Jeffrey L. Sheldon Sean A. Stokes UTC, The Telecommunications Association 1140 Connecticut Avenue, N.W. Suite 1140 Washington, D.C. 20036

Renie K. Kernen
Renee K. Kernan